

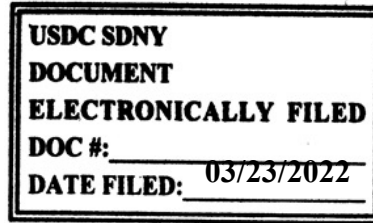
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March 22, 2022

VIA CM/ECF

MEMO ENDORSED

Hon. Katharine H. Parker
United States Magistrate Judge
U.S. District Court
500 Pearl Street, Room 750
New York, NY 10007

Re: **Contreras v. The Arkenstone, Ltd.; Cause No. 1:21-cv-11201-PGG-KHP**

Dear Judge Parker:

Pursuant to Sections I.b.-c. of Your Honor's *Individual Practices in Civil Cases* (Revised March 2021), Defendant The Arkenstone, Ltd. ("Arkenstone") moves for a 30-day extension to answer or otherwise move against the Complaint in the above-referenced matter. Plaintiff did not serve Arkenstone until March 16, 2022, triggering an initial answer date of April 6, 2022. The parties have agreed to a 30-day extension to Friday, May 6, 2022.

Additionally, the parties have agreed to request a reset of the Initial Conference, currently scheduled for March 30, 2022, to at least fourteen (14) days after the extended deadline to answer or otherwise move against the Complaint (May 6, 2022). Therefore, Arkenstone hereby moves to, and Plaintiff does not object to, a reset of the Initial Conference to a date no sooner than Monday, May 23, 2022. Then, the Parties will submit their Report of Rule 26(f) Meeting and Proposed Case Management Plan a week before the reset conference, as required. Defendant, however, anticipates moving to dismiss the Complaint, for among other things, lack of jurisdiction.

Sincerely,

Stinson LLP
/s/ Deborah Deitsch-Perez

Deborah Deitsch-Perez
(admitted in NY)

DRD:plt

APPLICATION GRANTED: The Defendant's deadline to respond to the complaint is hereby extended to May 6, 2022. The Initial Conference scheduled for Wednesday, March 30, 2022 at 10:00 AM in Courtroom 17D, 500 Pearl Street, New York, NY 10007 before Magistrate Judge Katharine H. Parker is hereby rescheduled to Wednesday, May 25, 2022 at 2:15 p.m.

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.

03/23/2022

cc: **All Counsel of Record, via CM/ECF**